

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

G.W,

Plaintiffs,

v.

NORTHBROOK INDUSTRIES,
INC., d/b/a UNITED INN AND
SUITES,

Defendants.

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Civil Action No.
1:20-cv-05232-JPB

**DEFENDANT NORTHBROOK INDUSTRIES, INC. d/b/a UNITED INN
AND SUITES' STATEMENT OF UNDISPUTED MATERIAL FACTS**

Defendant Northbrook Industries, Inc. d/b/a United Inn and Suites (“United”) respectfully submits this Statement of Undisputed Material Facts in Support of its Motion for Summary Judgment, showing this Honorable Court as follows:

1. This action involves claims by Plaintiff G.W. (“Plaintiff” or “G.W.”) against United for damages arising out of alleged violation of: (1) The Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. § 1595(a) [Count 1]; and (2) negligence [Count 2]. *See* Pl.’s Compl. at ¶¶ 2, 71-81, 82-109. Plaintiff’s Complaint is premised upon alleged TVPRA violations at the United Inn and Suites located at 4649 Memorial Drive, Decatur, Georgia (the “Property”).

A. Plaintiff's Alleged Trafficking at the Property and Other Hotels

2. Plaintiff G.W. alleges that she had been trafficked by Zaccheus Obie ("Mr. Obie") between June 22, 2017 and July 23, 2017. G.W. Dep. 34:23-35:3.

3. Plaintiff G.W. and her friend A.G., a plaintiff in a similar action against United, were put in contact with Mr. Obie through Quintavious Obie, Mr. Obie's cousin. G.W. Dep. 28:19-29:22.

4. G.W. was 17 years old during the time of alleged trafficking. G.W. Dep. 14:12-13. G.W. was under the impression Mr. Obie could get them into clubs to dance for money; G.W. alleges she did not know she would be performing sexual acts. G.W. Dep. 31:23-33:15.

5. After conversing with Mr. Obie via text message, G.W. and A.G. agreed to be picked up in commerce and taken into Atlanta to work for Mr. Obie. G.W. Dep 33:20-34:11.

6. On the night of June 23, 2017, G.W. and A.G. were taken to Red Roof Inn off Fulton Industrial Boulevard in Atlanta, Georgia; that evening they both performed commercial sex acts at the direction of Mr. Obie although he was not present. G.W. Dep. 38:1-25.

7. At the time, G.W. felt that she could physically leave the arrangement with Mr. Obie whenever she wanted to. G.W. Dep. 71:12-19; 72:17-25.

8. Mr. Obie later directed G.W. to solicit buyers of commercial sex acts in the area surrounding the Property and perform commercial sex acts in guest rooms he rented for her at the Property. G.W. Dep. 78:3-81:1.

9. On June 23, 2017, Mr. Obie and his associate Dontavious Carr, paid for and checked into Room 112 at the Property while G.W. and A.G. waited outside in Mr. Obie's car. G.W. Dep. 75:1-77:3; 78:20-79:15.

10. G.W. and A.G. then used that room to perform commercial sex acts. G.W. Dep. 77:1-21.

11. At no point during her alleged trafficking did G.W. ever check herself into any hotel room. G.W. Dep. 41:1-3.

12. G.W. found men to engage in commercial sex acts with by walking the streets around a hotel and from online websites. G.W. Dep. 56:6-57:6.

13. Mr. Obie would collect the money G.W. and A.G. earned after performance of commercial sex acts. G.W. Dep. 73:1-17.

14. During her alleged trafficking at the Property, G.W. only walked into the lobby of the United Inn and Suites to buy snacks or condoms; she did not engage in any conversation with staff while making these purchases. G.W. Dep. 125:21-126:11.

15. She also never informed any of United's staff that she was being forced to perform commercial sex acts. G.W. Dep. 121:9-14; 125:21-126:5; 172:7-173:6.

16. On June 26, 2017, G.W. and A.G. left the Property and went back home to family in Commerce, Georgia. G.W. Dep. 97:6-98:5.

17. On July 2, 2017, G.W. chose to leave home again and go back to the Property to continue working for Mr. Obie; A.G. chose not to go back and did not work with Mr. Obie again. G.W. Dep. 113:24-115:5.

18. G.W. stayed a second time at the United Inn and Suites on July 2, 2017. G.W. Dep. 46:15-20;115:1-5.

19. On her second visit to the Property, G.W. shared a room on the second floor with two other women working for Mr. Obie. G.W. Dep 118:17-119:1.

20. G.W. stayed in this room until July 3, 2017 before being moved to a different hotel. G.W. Dep. 119:2-10; 124:1-13.

21. Subsequently, G.W. stayed at and engaged in commercial sex acts at the following establishments: Western Inn in Forest Park, the Home Lodge Hotel of Forest Park, the EconoLodge in Forest Park off Old Dixie Highway, the Travel Lodge in College Park, an unidentified hotel off of Old National Highway, an unidentified hotel in East Point, and the Econolodge in Atlanta off Virginia Avenue, an unidentified hotel, the American Inn in Jonesboro off of Old Dixie Highway G.W. Depo. 128:2-139:23.

22. On July 17, 2017, G.W. went back home to Commerce, Georgia. G.W. Depo. 140:18-20.

23. On July 20, 2017, G.W. returned to the United Inn and Suites where Mr. Obie's associate, Kikia Anderson, checked into room 222 for G.W. and Shay. G.W. Depo. 144:1-25.

24. On July 21, 2017, G.W. left the United Inn and visited an unknown hotel off Old Dixie Highway in Jonesboro for the night of the July 21st – 22nd, 2017 before visiting the American Inn on Tara Boulevard in Jonesboro for the night of July 22nd – 23rd, 2017 to engage in commercial sex acts. G.W. Depo. 149:10-150:8; 153:20.

25. On July 23rd, GW alleges she was raped and robbed by a potential client while at the American Inn in Jonesboro. G.W. did not call the police. G.W. Depo. 154:6-155:8.

26. On July 23, 2017, Mr. Obie was arrested and G.W. was taken into the police department. G.W. Depo. 154:6-155:23.

B. The Property and its Operation During the Relevant Timeframe

27. The Property is an exterior access hotel; guests and visitors are able to come and go from guest rooms as they please without walking into the lobby of the hotel. G.W. Depo 171:3-25; Shareef Depo. 88:25-89:8; 94:20-95:18.

28. Ashar Islam was the general manager of the Property from 2017-2019 and reported directly to Tahir Shareef. Islam Depo. 13:21-14:14.

29. Mr. Tahir Shareef operates and owns an 81 percent stake in the Property. Shareef Depo. 22:1- 24:19.

30. The Property's lobby was open from 6 a.m. to 9 p.m.; from 9 p.m. to 6 a.m. only the window was open for check-in or purchases. Shareef Depo. 33:5-18.

31. Mr. Shareef had a security guard patrol the property from 10 p.m. to 2 a.m. each night on the property in 2017 – 2019. Shareef Depo. 92:1-13.

32. Mr. Shareef also spoke with staff about looking out for criminal activities including commercial sex activities. Shareef Depo. 188:2-14.

33. If Mr. Shareef thought something suspicious was going on with a person on property, Mr. Shareef would call the police to remove the person and encourage other the employees to do the same. Shareef Depo. 192:14-193:2.

34. Mr. Shareef resided at the Property most of the year. Shareef Depo. 26:21- 18:25.

35. However, Mr. Shareef never noticed any prostitution the United Inn and Suites at the time A.G. and G.W. allegedly were trafficked. Shareef Depo. 64:1-25.

36. Mr. Shareef was not aware of potential human trafficking of minors until August 2017, after the arrest of Mr. Obie. Shareef Depo. 297:4-300:8.

37. Similarly, Mr. Islam could not recognize or recall ever seeing G.W. or A.G. at the Property. Islam Depo. 105:2-5.

Respectfully submitted this the 21st day of December, 2023.

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RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14 point size.

Dated: December 21, 2023

/s/ *Adi Alushi*
ADI ALLUSHI

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2023, I electronically filed the foregoing *Defendant's Statement of Undisputed Material Facts* with the Clerk of Court using the CM/ECF filing system which will automatically send e-mail notification of such filing to the following counsel of record:

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